

**Civil Action Cover Sheet - Case Initiation**

(12/01/20) CCL 0520

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

DELFINA CORRAL,

v.

TARGET CORPORATION,

FILED  
1/27/2022 5:15 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2022L000881

16478025

No. 2022L000881

**CIVIL ACTION COVER SHEET - CASE INITIATION**

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. Only one (1) case type may be checked with this cover sheet.

Jury Demand ☐ Yes ☒ No**PERSONAL INJURY/WRONGFUL DEATH****CASE TYPES:**

- ☐ 027 Motor Vehicle  
☐ 040 Medical Malpractice  
☐ 047 Asbestos  
☐ 048 Dram Shop  
☐ 049 Product Liability  
☐ 051 Construction Injuries  
     (including Structural Work Act, Road  
     Construction Injuries Act and negligence)  
☐ 052 Railroad/FELA  
☐ 053 Pediatric Lead Exposure  
☐ 061 Other Personal Injury/Wrongful Death  
☐ 063 Intentional Tort  
☐ 064 Miscellaneous Statutory Action  
     (Please Specify Below\*\*) ☒ 065 Premises Liability  
☐ 078 Fen-phen/Redux Litigation  
☐ 199 Silicone Implant

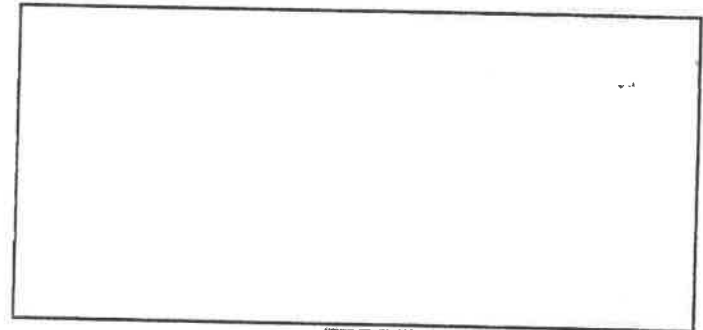
**TAX & MISCELLANEOUS REMEDIES****CASE TYPES:**

- ☐ 007 Confessions of Judgment  
☐ 008 Replevin  
☐ 009 Tax  
☐ 015 Condemnation  
☐ 017 Detinue  
☐ 029 Unemployment Compensation  
☐ 031 Foreign Transcript  
☐ 036 Administrative Review Action  
☐ 085 Petition to Register Foreign Judgment  
☐ 099 All Other Extraordinary Remedies

By: JEFFREY M. LANDRY Atty No.: 37849

(Attorney)

(Pro Se)



(FILE STAMP)

**COMMERCIAL LITIGATION****CASE TYPES:**

- ☐ 002 Breach of Contract  
☐ 070 Professional Malpractice  
     (other than legal or medical)  
☐ 071 Fraud (other than legal or medical)  
☐ 072 Consumer Fraud  
☐ 073 Breach of Warranty  
☐ 074 Statutory Action  
     (Please specify below.\*\*)  
☐ 075 Other Commercial Litigation  
     (Please specify below.\*\*)  
☐ 076 Retaliatory Discharge

**OTHER ACTIONS****CASE TYPES:**

- ☐ 062 Property Damage  
☐ 066 Legal Malpractice  
☐ 077 Libel/Slander  
☐ 079 Petition for Qualified Orders  
☐ 084 Petition to Issue Subpoena  
☐ 100 Petition for Discovery

\*\*

Primary Email: JEFFMLANDRY@aol.com (Attorney Email)

Secondary Email: jml.351hub@gmail.com (Paralegal Email)

Tertiary Email:

**Pro Se Only:** ☐ I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's Office for this case at this email address:

IRIS Y. MARTINEZ, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ATTY NO.: 37849

STATE OF ILLINOIS       )  
                                      ) SS  
COUNTY OF COOK       )

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

DELFINA CORRAL,                               )  
  )  
  ) Plaintiff,                               )  
  )  
  ) v.    ) Court No.:  
  )  
TARGET CORPORATION,                        )  
  )  
  ) Defendant.                            )

**COMPLAINT AT LAW**

NOW COMES plaintiff, DELFINA CORRAL, by and through her attorney, JEFFREY M. LANDRY, and complains of the above-named defendant as follows:

1. At all times alleged herein, plaintiff DELFINA CORRAL was and is a resident of the City of Melrose Park, County of Cook, State of Illinois.
2. At all times alleged herein, defendant TARGET CORPORATION was and is a corporation doing business of the City of Chicago, County of Cook, State of Illinois.
3. At all times alleged herein, defendant TARGET CORPORATION owned, operated, staffed, managed and maintained a big box and department store located at 130 South Mannheim Road, in the City of Hillside, County of Cook, State of Illinois.
4. On February 14, 2021, at approximately 8:30 p.m., and for a long time prior thereto, there was an unnatural, unreasonably dangerous condition at the customer entry way of the store described in paragraph 3 of this complaint that was caused by a

mat that had become saturated with ice and water from melting snow, resulting in an unnatural accumulation and aggravation of ice and snow at the entrance of said store.

5 The saturated mat described in paragraph 4 herein caused the accumulation of ice and snow to be more dangerous than it otherwise would have been.

6. At the aforesaid time, date and place, defendant TARGET CORPORATION, through its on-duty agents or employees, had actual or constructive notice of the condition described in paragraph 4 of this complaint.

7. On February 14, 2021, at approximately 8:30 p.m., plaintiff DELFINA CORRAL was a customer of defendant TARGET CORPORATION, lawfully upon the premises of the entry way of the store described in paragraph 3 of this complaint.

8. At all times alleged herein, defendant TARGET CORPORATION had a duty to exercise reasonable care for the safety of its customers who were lawfully upon the aforesaid premises, including plaintiff DELFINA CORRAL.

9. At all times alleged herein, plaintiff DELFINA CORRAL exercised reasonable care for her own safety.

10. At the aforesaid time, date and place, plaintiff DELFINA CORRAL came upon the aforesaid unnatural and unreasonably dangerous condition and fell, causing said plaintiff to sustain severe bodily injuries.

11. Defendant TARGET CORPORATION was guilty of one or more of the following careless and negligent acts or omissions:

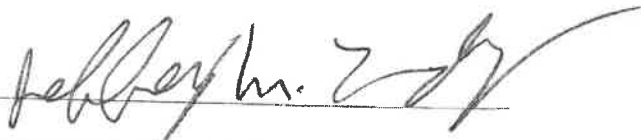
- (a) Carelessly and to change a mat that was saturated with water and ice that was located at an entry way of the store with a high rate of foot traffic;
- (b) Carelessly and negligently and negligently failed to warn its customers of the presence of an unnatural, unreasonably dangerous condition at the entry of its store;
- (c) Carelessly and negligently failed to place a non-slip surface on the floor adjacent to the mat;
- (d) Carelessly and negligently placed a mat that was not large enough to ensure the safety of its customers at the entry of the store;
- (e) Carelessly and negligently failed to remove excess water and ice from the mat and the immediate surrounding area;

- (f) Carelessly and negligently failed to provide a safe entrance for customers of the store;
- (g) Carelessly and negligently failed to adequately perform its voluntary undertaking to mitigate the risks posed by accumulations of ice and water at the entrance of the store.

12. As a direct and proximate result of one or more of the foregoing careless and negligent acts or omissions by defendant TARGET CORPORATION, plaintiff DELFINA CORRAL sustained bodily injuries, causing great pain, suffering, loss of a normal life, disability, lost income, and financial loss, requiring hospitalization and medical treatment and the expense associated therewith.

WHEREFORE, plaintiff DELFINA CORRAL prays judgment against defendant TARGET CORPORATION, in a fair and reasonable sum in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS.

By



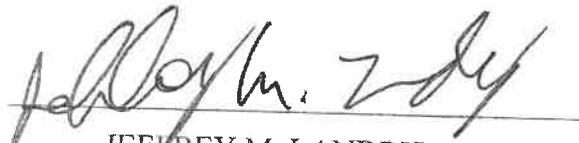
JEFFREY M. LANDRY  
351 West Hubbard Street, Suite 800  
Chicago, IL 60654  
Attorney No.: 37849  
(312) 759-7442  
ATTORNEY FOR THE PLAINTIFF

**AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222**

I, JEFFREY M. LANDRY, an attorney, being first duly sworn on oath, hereby state and depose as follows:

1. I am counsel for plaintiff DELFINA CORRAL in the present action.
2. Based upon plaintiff's medical bills and currently diagnosed injuries, the plaintiff's claim does exceed \$50,000.00.

FURTHER THE AFFIANT SAYETH NAUGHT

  
JEFFREY M. LANDRY